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November 27, 2019

Via ECF

The Honorable Lois Bloom
United States District Court for the Eastern District of New York
Theodore Roosevelt United States Courthouse
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Capogrosso v. Gelbstein, et al., No. 18 Civ. 2710 (MKB) (LB)

Dear Judge Bloom,

This Office represents Defendants Alan Gelbstein, Ida Traschen, and Danielle Calvo (collectively, the “State Defendants”) in the above-referenced matter. I write to request a two-week extension of the State Defendants’ time to answer the Complaint, and of all parties’ deadlines to submit their initial disclosures, from Wednesday, December 4 to Wednesday, December 18. I have recently taken over this case from my former colleague Mark Siegmund, who left government service last week to return to private practice. See Dkt. No. 84. The extension is necessary due to the Thanksgiving holiday and the need for me to familiarize myself with the case and to work individually with each State Defendant in order to ensure the correctness and completeness of the Answer.

I have reached out to the *pro se* attorney Plaintiff, who consents to the extension of the initial disclosure deadline, so long as he receives a concomitant two-week extension of his time to serve his initial disclosures, but not to an extension the State Defendants’ deadline to answer, because he feels that it is inconsistent with the Court’s orders. This is the first request any party has made for an adjournment of the Answer and initial disclosure deadlines, and I do not anticipate that it will impact any other deadlines in this proceeding. We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ James M. Thompson
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Cc: All counsel of record (via ECF)

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